



State
of
Colorado

Scott - CDPHE, Erin <erin.scott@state.co.us>

Produced Water Permit Certification COG840011 for Ritchie Exploration

8 messages

dknicholson@q.com <dknicholson@q.com>

Tue, Apr 9, 2013 at 10:41 AM

To: erin.scott@state.co.us

Cc: John Niernberger <jniernberger@ritchie-exp.com>

Erin

I would like to follow up on the progress of the new permit for the Anderson #1 site in Washington County operated by Ritchie Exploration, Inc.

Some time ago, I discussed with you the permit for this site issued on March 13, 2012, Permit Number COG 8400000, Certification Number COG840011. As you may recall, this permit was written incorrectly and describes the site as being in Garfield County and discharging to an intermittent stream tributary to the Colorado River. The new permit specified increased sampling for this site based on stream standards formulated for tributaries to the Colorado River, when in fact the discharge is not tributary to any receiving stream. Under the old general permit, Ritchie was only required to sample TSS, pH, and oil & grease.

At that time you instructed me to have Ritchie submit another permit application, which was sent to you in January. I was just informed by Ritchie that someone from the Division called and stated they are out of compliance with the permit written last year. Can you check on the progress of the new permit application? If necessary, I can come to your office to discuss this matter with you.

Thank you

Dave

David K Nicholson, P.G.

Nicholson GeoSolutions LLC

(303) 601-2023

Scott - CDPHE, Erin <erin.scott@state.co.us>

Tue, Apr 9, 2013 at 10:44 AM

To: dknicholson@q.com
Cc: John Niernberger <jniernberger@ritchie-exp.com>

Hi Dave,

I will look into the status of your application and get back with you.

Erin

[Quoted text hidden]

--
Erin Scott
Workgroup Lead
Assessment Based Permits Unit
Water Quality Control Division
(303) 692-3506
erin.scott@state.co.us

Scott - CDPHE, Erin <erin.scott@state.co.us>
To: Loretta Houk - CDPHE <loretta.houk@state.co.us>

Fri, Apr 12, 2013 at 10:50 AM

Hi Loretta,

Did you receive an application for them? Im not seeing anything in Spigot

[Quoted text hidden]

Scott - CDPHE, Erin <erin.scott@state.co.us>
To: dknicholson@q.com

Fri, Apr 12, 2013 at 12:19 PM

Dave,

Are you able to scan in and email the permit application that you sent back in January so that I can get this going?

Thank you,
Erin

On Tue, Apr 9, 2013 at 10:41 AM, <dknicholson@q.com> wrote
[Quoted text hidden]

[Quoted text hidden]

Scott - CDPHE, Erin <erin.scott@state.co.us>
To: dknicholson@q.com

Fri, Apr 12, 2013 at 4:40 PM

Hi Dave,

I have received your application Attached is a copy of the current permit for Ritchie. Note that the permit is written for an unnamed drainage to the Republican River. Is this incorrect?
Please advise.

Thank you,

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On Tue, Apr 9, 2013 at 10:41 AM, <dknicholson@q.com> wrote:
[Quoted text hidden]

[Quoted text hidden]

 **COG840011 Ritchie Exploration Cert Anderson.docx**
144K

dknicholson@q.com <dknicholson@q.com>
To: "Scott - CDPHE, Erin" <erin.scott@state.co.us>
Cc: John Niernberger <jniernberger@ritchie-exp.com>

Fri, Apr 12, 2013 at 6:06 PM

Erin,

The existing permit also names the Colorado River and the South Platte River in other spots. No, the discharge is to an unnamed drainage that is not tributary to any receiving stream. There is an area in central Washington County where the drainage flows to the northeast but ends before discharging to any named stream.

Dave

From: "Scott - CDPHE, Erin" <erin.scott@state.co.us>
To: dknicholson@q.com
Sent: Friday, April 12, 2013 4:40:19 PM
Subject: Re: Produced Water Permit Certification COG840011 for Ritchie Exploration

[Quoted text hidden]

dknicholson@q.com <dknicholson@q.com>
To: "Scott - CDPHE, Erin" <erin.scott@state.co.us>
Cc: John Niernberger <jniernberger@ritchie-exp.com>

Mon, Apr 22, 2013 at 2:07 PM

Erin

Just wanted to make sure you found the new permit application sent in January for the Anderson site. Do you need anything more from Ritchie to process the permit application for this site?

Dave

From: "Scott - CDPHE, Erin" <erin.scott@state.co.us>
To: dknicholson@q.com
Sent: Friday, April 12, 2013 4:40:19 PM
Subject: Re: Produced Water Permit Certification COG840011 for Ritchie Exploration

[Quoted text hidden]

Scott - CDPHE, Erin <erin.scott@state.co.us>
To: dknicholson@q.com

Mon, Apr 22, 2013 at 5:23 PM

Hi Dave,

I do see that the letter associated with your permit certification does contain an error in reference to the Colorado River. However, the permit certification itself (which is the document Ritchie would need to be in compliance with) is based upon the water quality standards associated with a drainage in the Republican River Sub-basin, segment COSPRE06, not the Colorado. The reference to the Colorado was a typo only in the letter, not the permit.

The permit is appropriately written for segment COSPRE06, an 'all tributaries' segment. Discharges to drainages, even if ephemeral, require the application of permit limitations associated with the applicable watershed, in this case the Republican River. I have attached a link to Regulation No. 38 which describes segment 06 of the Republican.

<http://www.colorado.gov/cs/Satellite?c=Page&childpagename=CDPHE-Main%2FCBONLayout&cid=1251595703337&pagename=CBONWrapper>

There was a compliance schedule item that was due 3/1/13 per your permit.

43699	Facility Evaluation Plan	Submit a report summarizing the first year of data collected and whether the limitations to be effective 1/1/16 can be met. Include an amendment request to remove parameters that are well below the detection limits or significantly below the permit limits as necessary.	3/1/13
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Please let me know if you have any further questions

Erin Scott

Workgroup Lead

Assessment Based Permits Unit

Water Quality Control Division

(303) 692-3506

erin.scott@state.co.us

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